



*"Educating Tomorrow's
Stars Today!"*

CALAVERAS COUNTY OFFICE OF EDUCATION

Received & Inspected
OCT 30 2008
FCC Mail Room

John C. Brophy

County Superintendent of Schools

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10-21-08

To: Letter of Appeal-CC Docket No. 02-6

Office of the Secretary

Federal Communications Commission

Office of the Secretary

445 12th Street, SW

Washington, DC 20554

To whom it may concern,

This is an appeal of the denial for 2008/2009, Form 471 # 626219, FRN 1772156, for a feature of our PRI telecommunications service, specifically for the Inform 911 feature. This service was determined to be ineligible during the PIA review and denied upon appeal. Please see attached denial letter from USAC. We are asking for a request for review from the FCC at this time.

While reviewing please consider the following information: Inform 911 is a component part, a feature of our PRI service which enables location information to be forwarded from our phone system to the ANI/ALI database so emergency responders will go to the correct address in the event of a 911 call. Our phone system services 3 sites from 3 different counties in CA, the counties miles apart from one another.

A demonstration of the necessity of Inform 911 service would be as follows:

An emergency responder receives a 911 call and sees the location as the home base of the phone system in Calaveras County and responds. The actual emergency was at our school site in Tuolumne or Amador counties. Emergency responders are dispatched to the wrong address since the Inform 911 feature is not in force, so responders were unable to arrive to the necessary location in time to assist with the emergency. (fire, medical, etc...)

However, with the Inform 911 feature, emergency responders would be dispatched to the correct location where the emergency is occurring.

Per 2008/2008 Eligible Services List, "

"Telephone Service" refers to communication that takes place using the public switched telephone network. Costs to subscribe to a telephone service are generally eligible for discount....

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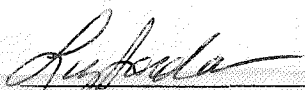
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...Service to an eligible location for educational or library purposes can provide voice communication, fax connections, modem connections, 911/E911 trunks/lines or an alarm telephone line...."

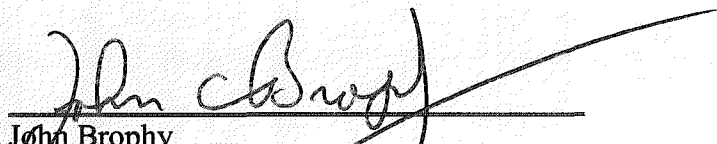
Inform 911 provides location information, equivalent functionality to what is transmitted over public switched telephone network via voice communications lines, as described in Eligible Services list above as eligible.

We appreciate your reconsideration of the funding request for this service.

Thank you,
Liz Jordan



Liz Jordan
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Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2008-2009

October 14, 2008

Liz Jordan
Calaveras County Office of Education
185 South Main Street
P. O. Box 760
Angels Camp, CA 95221

Re: Applicant Name: CALAVERAS CO OFF OF EDUCATION
Billed Entity Number: 144350
Form 471 Application Number: 626219
Funding Request Number(s): 1772156
Your Correspondence Received: October 06, 2008

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2008 Funding Commitment Decision Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1772156
Decision on Appeal: **Denied**
Explanation:

- According to our records, this FRN included recurring and non-recurring annual pre-discount charges totaling \$3,546.00 for Inform 911 service. Accordingly, your funding request was denied. In your appeal, you have not demonstrated that USAC's initial determination was incorrect. Consequently, your appeal is denied.
- FCC rules provide that funding may be approved only for eligible products and services. See 47 C.F.R. secs. 54.502, 54.503. The USAC website contains a list of eligible products and services. See the website, www.usac.org/sl, Eligible Services List. FCC rules further require that if 30% or more of the applicant's funding request includes ineligible products and/or services, then the funding request must be denied, otherwise the funding request will be reduced

accordingly. *See* 47 C.F.R. sec. 54.504(d). The FCC's Aiken County Public Schools Order directed USAC to permit the applicant 15 calendar days from the date of receipt of notice in writing by USAC to revise its funding request to remove the ineligible services or allow the applicant to provide additional documentation to show why the services are eligible. *See* Requests for Review of the Decisions of the Universal Service Administrator by Aiken County Public Schools Aiken, SC, et al., Schools and Libraries Universal Service Support Mechanism, File No. SLD-397612, et al., CC Docket No. 02-6, Order, 22 FCC Rcd 8735, FCC 07-61 para. 11 (May 8, 2007).

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company